

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BRIAN WOLOSHIN, on behalf of himself
and all others similarly situated

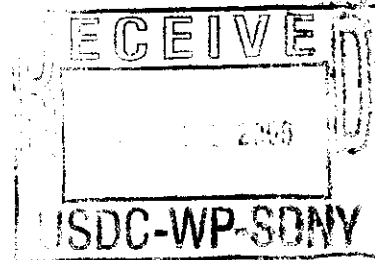
Plaintiff,

-against-

AETNA LIFE INSURANCE COMPANY,

Defendant.

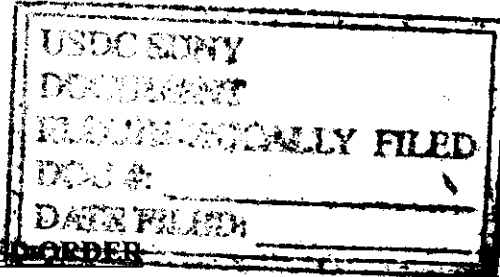
STIPULATION AND PROPOSED ORDER



Case No. 07 CV 6664 (KMK)

ECF CASE

Magistrate Judge Yantilis



The Parties hereby submit this Stipulation and Proposed Order for the Court's consideration staying the deadlines listed in the March 13, 2008 Joint Stipulation and Order Extending Defendant's Time to Respond to Plaintiff's First Request for the Production of Documents (the "Scheduling Order") as follows:

WHEREAS, On March 13, 2008, the Court entered the Scheduling Order, requiring, *inter alia*, that Plaintiff file his Motion for Class Certification on or before August 29, 2008 and that all dispositive motions will be filed by January 29, 2009;

WHEREAS, Defendant has stated its intentions to file a Motion for Summary Judgment;

WHEREAS, The Parties have been engaging in discovery in connection with Defendant's Motion for Summary Judgment;

WHEREAS, Defendant has agreed to produce for depositions the four witnesses designated by Plaintiff as soon as practicable.

WHEREAS, The Parties have agreed that a decision on Defendant's Motion for Summary Judgment may be dispositive of the Plaintiff's claims in this action;

THEREFORE IT IS HEREBY STIPULATED AND AGREED THAT:

1. Plaintiff shall complete all discovery relating to Defendant's Motion for Summary Judgment by October 15, 2008.
2. Defendant shall file its letter to Judge Karas seeking leave to file its motion for Motion for Summary Judgment by October 20, 2008.
3. All other future deadlines listed in the Scheduling Order are stayed pending the Court's decision on Defendant's Motion for Summary Judgment.

CONSENTED TO BY:

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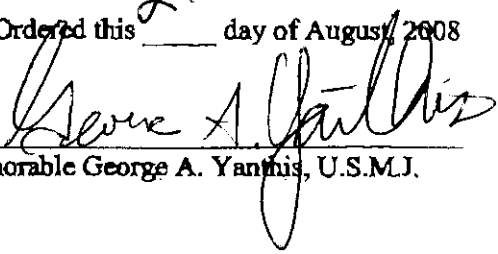
-and-

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*Attorneys for Plaintiff Brian Woloshin,
on behalf of himself
and all others similarly situated*

Dated:
New York, New York
August 26, 2008

So Ordered this 29th day of August, 2008


Honorable George A. Yanulis, U.S.M.J.

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Dated: